## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

In re POLYURETHANE FOAM ANTITRUST LITIGATION	) ) ) ) MDL Docket No. 2196) Index No. 10-MD-2196 (JZ)
This document relates to:	)
ALL CASES	) )

## **NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, the Direct Purchaser (Class) Plaintiffs, the Direct Action Plaintiffs, and the Indirect Purchaser (Class) Plaintiffs ("Plaintiffs") will take a deposition of **David Cutler** of Future Foam at **Kutak Rock LLP**, **5 Park Plaza**, **Suite 1500**, **Irvine**, **CA 92614** on **August 27**, **2013** at **9:00 a.m. P.S.T.** The testimony will be recorded by stenographic and videotaped means by a person authorized to administer oaths. The deposition shall continue from day to day until completed in accordance with the Federal Rules of Civil Procedure and the orders of this Court. All parties are invited to attend.

Pursuant to the Court's order at the October 24, 2012 hearing (ECF No. 436 at 77–78), Plaintiffs provide a brief description of the deponent, to extent allowed by the protective order in this matter, as follows: **sales manager**.

Dated: July 23, 2013

/s/ William A. Isaacson\_\_\_\_\_

William A. Isaacson

BOIES, SCHILLER & FLEXNER LLP

5301 Wisconsin Avenue, NW

Washington, DC 20015 Phone: 202-237-5607

Fax: 202-237-6131

/s/ Stephen R. Neuwirth\_\_\_\_

Stephen R. Neuwirth

QUINN EMANUEL URQUHART

& SULLIVAN, LLP

51 Madison Avenue, 22nd Floor

New York, NY 10010 Phone: 212-849-7165

Fax: 212-849-7100

## Interim Co-Lead Counsel for Direct Purchaser (Class) Plaintiffs

\_/s/ Marvin A. Miller\_\_\_\_\_

Marvin A. Miller

MILLER LAW LLC

115 South LaSalle Street, Suite 2910

Chicago, IL 60603

Phone: 312-332-3400

Fax: 312-676-2676

## Interim Lead Counsel for Indirect Purchaser Class Plaintiffs

/s/ William J. Blechman

William J. Blechman KENNY NACHWALTER, P.A. 201 South Biscayne Blvd., Suite 1100

Miami, FL 33131 Phone: 305-373-1000 Fax: 305-372-1861

Liaison Counsel for Direct Action Plaintiffs